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Attorneys for Plaintiffs
ROLANDO PIMENTEL AND
ZACHARIAS SALAS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROLANDO PIMENTEL, et al.,

Plaintiffs,

v.

ROBERT BONSALE, et al.,

Defendants.

CASE NO. 3:18-cv-01958-EMC

Related to Case No. 18-cv-00411-EMC

**STIPULATION AND ~~[PROPOSED]~~
ORDER RE AMENDMENT OF
COMPLAINT AND DISCOVERY** (MODIFIED)

Date: August 30, 2018
Time: 1:30 p.m.
Courtroom: 5, 17th Floor
Judge: Hon. Edward M. Chen

Complaint Filed: February 2, 2018
Trial Date: Not set

1 Plaintiffs Rolando Pimentel and Zacharias Salas ("Plaintiffs") and Defendants Robert
2 Bonsall and Beeson, Tayer, & Bodine APC ("Defendants") (collectively, "the Parties") having met
3 and conferred subsequent to the Case Management Conference held on May 31, 2018, hereby
4 submit the following stipulation. The parties agree:

5 1. Plaintiffs will not be amending the Complaint as against Defendants Robert Bonsall
6 and Beeson, Tayer, & Bodine APC at this time, but reserve the right to do so after the pending
7 motion to dismiss is resolved.

8 2. Pursuant to this Court's Civil Minutes of the May 31, 2018 Case Management
9 Conference, counsel for the parties met and conferred on June 8, 2018 regarding the scope of
10 discovery to be conducted between now and August 30, 2018, and have no disputes to report.

11 Dated: June 11, 2018

GORDON REES SCULLY MANSUKHANI, LLP

12 By: /s/ Ryan B. Polk

13 Linda M. Moroney

14 Ryan B. Polk

Kevin Liu

15 Attorneys for Defendants

16 ROBERT BONSALE AND

BEESON, TAYER, & BODINE APC

17 Dated: June 11, 2018

Law Office of Kenneth C. Absalom

18 By: /s/ Kenneth C. Absalom

19 Kenneth C. Absalom

Counsel for Plaintiffs Pimental and Salas

20
21 **ATTESTATION**

22 In accordance with Civ. L.R. 5.1(i)(3), I attest that concurrence in the filing of this
23 document has been obtained from the other Signatories, which shall serve in lieu of their signatures
24 on the document.

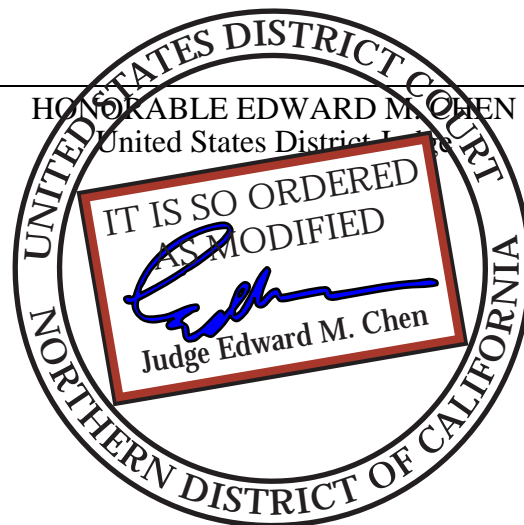
25 Dated: June 11, 2018

26 By: /s/ Kevin Liu

27 Kevin Liu

1 **IT IS SO ORDERED.** Motion to dismiss and CMC reset from 8/30/18 to 9/6/18
2 at 1:30 p.m. Joint CMC statement due 8/30/18.

3 DATED: 6/12
4 _____, 2018



1 **CERTIFICATE OF SERVICE**

2 I am a resident of the State of California, over the age of eighteen years, and not a party to
3 the within action. My business address is: Gordon Rees Scully Mansukhani, LLP, 275 Battery
4 Street, Suite 2000, San Francisco, CA 94111. On the date below, I served the within documents:

5 **STIPULATION AND [PROPOSED] ORDER RE AMENDMENT OF COMPLAINT AND
6 DISCOVERY**

- 7 ☐ **BY ELECTRONIC MAIL:** I hereby certify that on _____ 2018, a copy of the
8 foregoing documents were filed electronically. Notice of this filing will be sent by
9 operation of the Court's electronic filing system to all parties indicated on the
10 electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties
11 may access this filing through the Court's electronic filing system.
- 12 ☐ **BY OVERNIGHT MAIL.** I deposited said document(s) by placing a true copy
13 thereof enclosed in a sealed envelope, at a station designated for collection and
14 processing of envelopes and packages for overnight delivery by and overnight
15 delivery services company as part of the ordinary business practices of Gordon Rees
16 Scully Mansukhani, LLP, described below, addressed as set forth below.
- 17 ☐ **BY U.S. MAIL:** I placed the document(s) listed above in a sealed envelope with
18 postage thereon fully prepaid, in United States mail in the State of California
19 addressed as set forth below.
- 20 ☒ **BY ELECTRONIC FILING.** I hereby certify that on June 11, 2018, a copy of the
21 foregoing documents were filed electronically. Notice of this filing will be sent by
22 operation of the Court's electronic filing system to all parties indicated on the
23 electronic filing receipt. All other parties will be served by regular U.S. Mail.
24 Parties may access this filing through the Court's electronic filing system.

25 **Attorneys for Plaintiff:**

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I am readily familiar with the firm's practice of collection and processing correspondence
for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same
day with postage thereon fully prepaid in the ordinary course of business. I am aware that on
motion of the party served, service is presumed invalid if postal cancellation date or postage meter
date is more than one day after the date of deposit for mailing in affidavit.

1 I declare under penalty of perjury under the laws of the United States of America that I am
2 employed in the office of a member of the Bar of this Court at whose direction the service was
3 made.

4 Executed on June 11, 2018, at San Francisco, California.

5 By: /s/ Mary Grogan